

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Investigation by the Department of Telecommunications and Energy on its own Motion into the Appropriate Pricing, based upon Total Element Long-Run Incremental Costs, for Unbundled Network Elements and Combinations of Unbundled Network Elements, and the Appropriate Avoided Cost Discount for Verizon New England, Inc. d/b/a Verizon Massachusetts' Resale Services in the Commonwealth of Massachusetts

DTE 01-20

MASTER LIST OF AT&T MARKED EXHIBITS

<u>EXHIBIT</u>	<u>DESCRIPTION</u>	<u>DATE MARKED</u>
Exh. ATT-1	Direct Testimony of John Hirshleifer, 5/8/01	January 7, 2002
Exh. ATT-2	Rebuttal Testimony of John Hirshleifer, 7/18/01	January 7, 2002
Exh. ATT-3	Surrebuttal Testimony of John Hirshleifer, 12/17/01	January 7, 2002
Exh. ATT-4	Excerpt from Financial Accounting Standards Board, "Statement of Financial Accounting Concepts No. 2: Qualitative Characteristics of Accounting Information" (May 1980), cited in the Surrebuttal Testimony of Dr. John M. Lacey on behalf of Verizon, at 13-14	January 8, 2002
Exh. ATT-5	Direct Testimony of Richard Lee, 5/8/01	January 8, 2002
Exh. ATT-6	Rebuttal Testimony of Richard Lee, 7/18/01	January 8, 2002
Exh. ATT-7	Surrebuttal Testimony of Richard Lee, 12/17/01	January 8, 2002
Exh ATT-8	Excerpt from New Jersey PUC Decision, 12/17/01	January 7, 2002
Exh ATT-9	Joint Declaration of Donna C. Cupelo, Patrick A. Garzillo and Michael J. Anglin from CC Docket No. 01-324	January 7, 2002
Exh ATT-10	AT&T Wireless Services Earnings Commentary, 10/23/01	January 7, 2002
Exh ATT-11	Rhode Island PUC Report and Order in Docket 2681, 11/18/01	January 8, 2002
Exh ATT-12	Excerpt from WorldCom New Jersey' Brief	January 8, 2002

<u>EXHIBIT</u>	<u>DESCRIPTION</u>	<u>DATE MARKED</u>
Exh ATT-13	Direct Testimony of Richard Walsh, 5/8/01	January 18, 2002
Exh ATT-14	Rebuttal Testimony of Richard Walsh, 7/18/01	January 18, 2002
Exh ATT-15	Surrebuttal Testimony of Richard Walsh, 12/17/01	January 18, 2002
Exh ATT-16	Rebuttal Testimony of Steven Turner, 7/18/01	January 23, 2002
Exh ATT-17	Surrebuttal Testimony of Steven Turner, 12/17/01	January 23, 2002
Exh ATT-17 P	Surrebuttal Testimony of Steven Turner, 12/17/01 [Proprietary]	January 23, 2002
Exh ATT-18	Excerpts from Bell Atlantic NY's Panel Testimony, dated February 24, 2000	January 25, 2002
Exh ATT-19	Direct Testimony of William Salvatore and Frank Lombardi, 5/8/01	January 23, 2002
Exh ATT-20	Revised Rebuttal Testimony of Catherine Pitts, 8/24/01	January 29, 2002
Exh ATT-20-P	Proprietary Exhibits 2, 3 and 4 to the Revised Rebuttal Testimony of Catherine Pitts, 8/24/01	January 29, 2002
Exh ATT-21	Surrebuttal Testimony of Catherine Pitts, 12/17/01	January 29, 2002
Exh ATT-22	Rebuttal Testimony of William Salvatore, 7/18/01	January 23, 2002
Exh ATT-23	Rebuttal Testimony of Michael Baranowski, 7/18/01	January 29, 2002
Exh ATT-24	Supplemental Rebuttal Testimony of Michael Baranowski, 12/17/01 [PUBLIC VERSION]	January 29, 2002
Exh ATT-24-P	Supplemental Rebuttal Testimony of Michael Baranowski, 12/17/01 [PROPRIETARY VERSION]	January 29, 2002
DISCOVERY RESPONSES		
Exh. ATT-VZ 1-8	Verizon's response regarding Depreciation—Denial of plans for ATM switch deployment in Verizon MA	January 8, 2002
Exh. ATT-VZ 1-12	Verizon's response regarding Depreciation—Denial of plans for fiber in distribution network	January 8, 2002
Exh. ATT-VZ 3-3	Verizon's response regarding Switching—Refers to VZ responses to 2-31 and 3-4... <u>3-4</u> ; VZ denies seeking competitive bids for installing new switches... <u>2-31</u> :	January 29, 2002
Exh. ATT-VZ 4-1	Verizon's response regarding Switching—Supplemental Response revised due to DTE order (10/18/01)... VZ provides step-by-step	January 29, 2002

<u>EXHIBIT</u>	<u>DESCRIPTION</u>	<u>DATE MARKED</u>
	delineation of the process product managers used to derive the estimate regarding all inputs used in Part C of VZ Cost Study	
Exh. ATT-VZ 4-292S	Verizon's response regarding Switching—Business Plan access line forecast for MA for years 2001-2006	January 24, 2002
Exh. ATT-VZ 4-37	Verizon's response regarding Switching—Denies the ability to derive the requested level of detail without “undertaking a burdensome special study”	January 29, 2002
Exh. ATT-VZ 4-40	Verizon's response regarding Switching—States that every component that would be required to engineer, build and purchase a switch from scratch is NOT included in the year 2000 switch purchases from Lucent	January 29, 2002
Exh. ATT-VZ 4-41	Verizon's response regarding Switching—Same response as 4-40 but refers to purchases from Nortel as opposed to Lucent	January 29, 2002
Exh. ATT-VZ 4-46	Verizon's response regarding Switching—Redefined “designed busy-hour minutes of use capacity. Also corrected errors made in workpapers of Cost Study, Parts C-2 and C-3, provided in attachment	January 29, 2002
Exh. ATT-VZ 4-48	Verizon's response regarding Switching—Supporting documentation for the busy hour to any hour of the day conversion factor is located in Part C-3, WorkPaper Section 7, p.1	January 29, 2002
Exh. ATT-VZ 4-49	Verizon's response regarding Switching—Supporting documentation for the development of the non conversation time factor is located in Part C-3, Workpaper Section 6, p.1	January 29, 2002
Exh. ATT-VZ 5-12	Verizon's response regarding Collocation—Summary of jobs	January 22, 2002
Exh. ATT-VZ 10-1	Verizon's response regarding Cost of Capital—Interest rates paid on Verizon's short term debt obligation	January 7, 2002
Exh. ATT-VZ 10-3 S	Verizon's response regarding Cost of Capital—Schedule of testimonies by Dr. Vander Weide in all TELRIC Cost Proceedings with the cost of debt, cost of equity, capital structure weights and overall cost of capital figures included	January 7, 2002
Exh. ATT-VZ 10-4	Verizon's response regarding Cost of Capital—Objection to request regarding the list of 200 providers authorized for local service in MA, according to Dr. Vander Weide's Testimony (p.27)	January 7, 2002
Exh. ATT-VZ 12-11	Verizon's response regarding Switching—Design differences between UNE switching terminating MOUs and reciprocal compensating terminating MOUs	January 24, 2002

<u>EXHIBIT</u>	<u>DESCRIPTION</u>	<u>DATE MARKED</u>
Exh. ATT-VZ 12-15	Verizon's response regarding Switching—States that the inputs used for all feature SCIS/IN in VZ Cost Study are based on opinion of product manager. Denies any additional supporting documentation to explain analysis or calculations	January 29, 2002
Exh. ATT-VZ 12-16	Verizon's response regarding Switching—States intercom features have usage component. Denies no specific usage study performed. Similar to 12-15, intercom features used are based on the opinion of the product manager and there is NO additional supporting documentation	January 29, 2002
Exh. ATT-VZ 24-2	Verizon's response regarding Depreciation—Docket number and date of order mentioned in Mr. Sovereign's Testimony where the state "elected not to use the latest FCC prescription"	January 8, 2002
Exh. ATT-VZ 24-3	Verizon's response regarding Depreciation—Docket number and date of order mentioned in Mr. Sovereign's Testimony where the commission "determined that the financial reporting lives of all telecommunications providers can be used to establish a fair benchmark to set up UNE prices" Includes a table listing actual lives adopted	January 8, 2002
Exh. ATT-VZ 26-13	Verizon's response regarding Cost of Capital—Schedule 4 of Dr. Vander Weide's Rebuttal Testimony with workpapers and source data provided	January 7, 2002
Exh. CC-VZ 1-14	Verizon's response regarding Depreciation—States that, within loops, there is no percentage of VZ's plant-in-service beyond economic lives it uses for depreciating plant-in-service	January 8, 2002